

JAP:LKG

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

15-17371

COMPLAINT

- against -

(21 U.S.C. §§ 952(a) and 960)

ALLYSSA PETERS,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JONATHAN PAPLOW, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

Upon information and belief, on or about August 6, 2015, within the Eastern District of New York and elsewhere, the defendant ALLYSSA PETERS did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent’s information and belief are as follows:¹

1. On or about August 6, 2015, the defendant ALLYSSA PETERS arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York aboard Caribbean Airlines flight no. 524 from Suriname by way of Georgetown, Guyana.

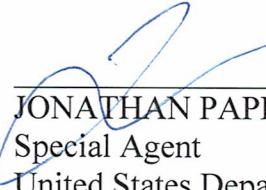
¹ Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. Upon her arrival at JFK, the defendant ALLYSSA PETERS was selected for an enforcement examination by United States Customs and Border Protection (“CBP”). The defendant presented one tan “Morano” suitcase for inspection. The defendant acknowledged ownership of the bag and its contents. Upon inspecting the defendant’s bag, the CBP officer observed that the wooden planks in the bag were unusually thick. Additionally, the CBP officer smelled a heavy scent of glue coming from the bag. The CBP officer subsequently probed the wooden planks inside of the bag, revealing a white, powdery substance. A field-test of the substance was positive for cocaine. The total approximate gross weight of the cocaine was 2,558.6 grams.

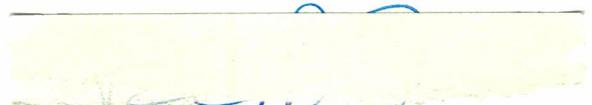
3. After being placed under arrest, the defendant ALLYSSA PETERS was advised of her Miranda rights by HSI agents. The defendant waived her rights and agreed to speak with law enforcement agents. The defendant stated, in sum and substance and in part, that she knew she was carrying drugs, and that she expected to be paid \$8,000 for bringing the drugs into the United States. The further admitted that she brought drugs into the United States once before, on or about April 30, 2015.

WHEREFORE, your deponent respectfully requests that the defendant
ALLYSSA PETERS be dealt with according to law.

Dated: Brooklyn, New York
August 7, 2015


JONATHAN PAPLOW
Special Agent
United States Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
7th day of August, 2015


THE HONORABLE RAMON E. REYES
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK